

April 6, 2020

Via CM/ECF electronic filing

Honorable United States District Judge George C. Hanks, Jr.
United States Courthouse
515 Rusk Street, Room 6202
Houston, Texas 77002

Re: 4:19-CV-1648; Kareem Roschard Jefferson v. Detention Officer Ramos

LETTER TO THE COURT

Dear Judge Hanks:

This correspondence is made pursuant to the Court's procedures. The undersigned attorney has sent a letter to the Plaintiff regarding discovery concerns but has not heard back from the Plaintiff as he is in the custody of Fort Bend County Jail.

Defendant Ramos is unable to comply with discovery requirements due to the ongoing pandemic and lockdown. Defendant Ramos is a Detention Officer at the Harris County Jail. Records related to this case are maintained by the Harris County Sheriff's Office. The HCSO legal department is unavailable to provide records due to the current stay at home order in place. As such, discovery pursuant to the existing court orders is impossible. Specifically, Defendant is unable to comply with the discovery deadline of April 16 and the dispositive motions deadline thereafter. As of this writing, Harris County lockdown is to continue through April 30 but may be extended further.

Furthermore, Plaintiff was charged with assault on a public servant under Harris County Cause 1626298 related to his allegations. Plaintiff has an open warrant related to these charges for failing to appear at a court hearing (likely because he was in Fort Bend County Jail). Defendant would ask that all discovery be stayed until the conclusion of his criminal charges.

Sincerely,

/s/ Stan Clark

STAN CLARK

Assistant County Attorney

SBN: 24062666

FBN: 3121992

1019 Congress, 15th Floor

Houston, Texas 77002

Telephone: (713) 755-5117

stan.clark@cao.hctx.net

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2020, a true and correct copy of the foregoing was filed via the Court's CM/ECF system and a copy mailed to the Plaintiff at the following address:

Kareem Roschard Jefferson #00074407
Ft Bend County Jail
1410 Williams Way Blvd
Richmond, TX 77469

/s/ Stan Clark

STAN CLARK